



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 2, 2018

BY ECF

Hon. Katherine B. Forrest
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Razhden Shulaya, et al.*, 17 Cr. 350 (KBF)

Dear Judge Forrest:

The Government writes to respectfully request that the May 3, 2018 status conferences for Group D (Lomishvili, Marat-Uulu, Petrushyn), Group E (Melman), and Group F (Savgir, Sosunov, Thomas, Dovlatyan) be adjourned. The Government is unaware of any issues that require the Court's intervention at this time, and an adjournment would facilitate the parties' consideration of final motion practice, dispositions, or preparations for trial. The Government has contacted counsel for each of the remaining defendants in Groups D, E, and F to solicit their respective positions on this requested adjournment. As of the filing of this letter, all responsive counsel have consented to the proposed adjournment. As of the filing of this letter, the Government has not received a response from counsel to Thomas.

Should the Court grant this request, the Government also respectfully submits that the time between May 3, 2018 and the date of the next conference should be excluded from computation under the Speedy Trial Act because such an exclusion would be in the interests of justice and outweighs the best interests of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). Among other things, such an exclusion would facilitate the defendants' review of discovery, the parties' ongoing motion briefing or consideration, and, as relevant to certain defendants, discussions regarding a pretrial disposition.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

by: /s/
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